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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
AIR AND RADIATION DIVISION
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

**DATE:** AUG 31 1994

**SUBJECT:** Proposed Plan, Albion-Sheridan Township Landfill, Albion, Michigan

**FROM:** Daniel L. Meyer, Environmental Engineer DLM
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**TO:** Heidi Valetkevitch, Community Relations Coordinator
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**THRU:** Carlton T. Nash, Chief CTN
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This memorandum is in response to a request for comments on the subject document dated August 19, 1994, from Leah Evison. The United States Environmental Protection Agency (USEPA) is recommending capping of the landfill. Often, this activity includes excavation, and excavation produces fugitive dust emissions. The National Ambient Air Quality Standard (NAAQS) for particulate matter is 150 $\mu g/m^3$ averaged over a 24-hour period, the annual standard is 50 $\mu g/m^3$.

The USEPA is also recommending landfill gas venting. Landfill gas venting releases volatile organic compound (VOC) into the air unless control technology, such as flaring, is employed. Ozone, a National Ambient Air Quality Standard (NAAQS) criteria pollutant, is the product of chemical reactions involving VOCs, nitrogen oxides, and sunlight. The Albion-Sheridan Township Landfill is located in an ozone nonattainment area (incomplete data area). In light of the facts presented here, VOC emissions due to remedial activity at this site should be minimized to prevent the formation of ozone.

A New Source Performance Standard (NSPS) for municipal solid waste landfills would establish three control options for landfill vent gases. The first option would be to install a control device capable of achieving a control efficiency of 98 percent by weight. The second option would be to install a flare which would meet the operating requirements in 40 CFR 60.18. In short, 40 CFR 60.18 states requirements for visible emissions; continuous flame; heating value of the gas; exit velocity of the gas; and flare type (steam-assisted, air-assisted, or nonassisted). The third option would be

to collect the landfill gas for later use or sale. The NSPS would apply to municipal solid waste landfills that emit 150 Mg/yr or more of nonmethane organic compounds. The standard was proposed on May 30, 1991, (56 FR 24468). No major changes are expected, but revisions to the final rule will include the clarification of recordkeeping requirements and compliance determination procedures. Also, the default values for some of the parameters in the emission estimation equation in proposed 40 CFR 60.753 (56 FR 24503) may be changed.

If you have any questions regarding these comments, please contact me at 6-9401.